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17 *Attorneys for Defendant*

18 **UNITED STATES DISTRICT COURT**

19 **NORTHERN DISTRICT OF CALIFORNIA**

20 **SAN JOSE DIVISION**

21 MAXIMILIAN KLEIN and SARAH GRABERT,
22 individually and on behalf of all others similarly
23 situated,

24 Plaintiffs,

25 v.

26 FACEBOOK, INC., a Delaware corporation,

27 Defendant.

Case No. 5:20-cv-08570-LHK

**DECLARATION OF DAVID Z.
GRINGER IN SUPPORT OF JOINT
MOTION FOR ADMINISTRATIVE
RELIEF TO CONSIDER WHETHER
CASES SHOULD BE RELATED**

1 I, David Z. Gringer, declare as follows:

2 1. I am a partner at Wilmer Cutler Pickering Hale and Dorr LLP. I represent
3 Defendant Facebook, Inc. in the above-captioned action.

4 2. On August 11, 2021, my colleague Molly Jennings emailed counsel for plaintiffs
5 in this action and asked whether the plaintiffs in the above-captioned case (“*Klein*”) would
6 stipulate to Facebook’s motion that *Loveland et al. v. Facebook et al.*, 3:21-cv-03300-CRB
7 should be related to *Klein*. The Plaintiffs in *Loveland* support the motion. The next day, counsel
8 for the *Klein* plaintiffs responded that neither User Plaintiffs nor Advertiser Plaintiffs take any
9 position with respect to whether *Loveland* and *Klein* should be related. I was copied on these
10 correspondences.

11 3. The Complaint in *Loveland* is attached as Exhibit 1 to this declaration.

12 I declare under penalty of perjury that the foregoing is true and correct.

13 Executed on this 18th day of August, 2021 in Brooklyn, New York.

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15 By: /s/ David Z. Gringer

16 David Z. Gringer
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SIGNATURE ATTESTATION

I am the ECF User whose identification and password are being used to file the foregoing. Pursuant to Civil Local Rule 5-1(i), I hereby attest that the other signatories have concurred in this filing.

Dated: August 18, 2021

/s/ Sonal N. Mehta

Sonal N. Mehta